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Corporation Counsel

CHAMBERS OF
DEBRA FREEMAN
U.S.M.J.

THE CITY OF NEW YORK
LAW DEPARTMENT
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August 20, 2012

By FAX (212) 805-4258
Honorable Debra Freeman
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Levar T. Henry v. City of New York, et al.,
11 Civ. 2604 (LTS)(DCF)

MEMO ENDORSED

Your Honor:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of The City of New York, representing the defendants in this action. I am writing to request a sixty-day extension of time to complete fact discovery, from August 31, 2012 to October 31, 2012. Plaintiff's counsel, Pete Shen, consents to this request.

While this case was originally filed in 2011, plaintiff's counsel first appeared on this case in March of this year, and a case management conference was held on April 26, 2012. Since then the parties have been conducting paper discovery, which is ongoing as defendants continue to search for certain documents. The parties are starting depositions this week. Depositions have been delayed by several weeks due to scheduling conflicts.

*Deadline for completion of
all discovery is extended to
October 31, 2012.*

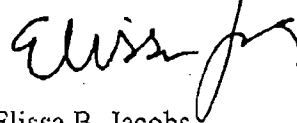
SO ORDERED: DATE: 8/21/12

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DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE

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No previous request for an extension of discovery has been made by either party. Accordingly, we respectfully request an 60-day extension of discovery to October 31, 2012. Thank you for your consideration of this request.

Respectfully submitted,



Elissa B. Jacobs
Assistant Corporation Counsel

cc: Pete Shen By E-MAIL
 Attorney for Plaintiff